



For a thriving New England

CLF Massachusetts

62 Summer Street

Boston MA 02110

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www.clf.org

June 22, 2020

Submitted via FOIAonline

Regional Freedom of Information Officer
U.S. EPA, Region 1 (OARM01-6)
5 Post Office Square, Suite 100 Boston, MA 02109-3912

Re: Freedom of Information Act Request

To Whom It May Concern:

Pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552 et seq., Conservation Law Foundation ("CLF") hereby requests all records pertaining to the nonferrous rolling and drawing facility (SIC code 3356) listed on the Environmental Protection Agency Enforcement and Compliance History Online (ECHO) website as Texas Instruments, Inc., 34 Forest , Attleboro, MA 02703, as follows:

- Compliance documents associated with the facility's National Pollutant Discharge Elimination System (NPDES) Permit (No. MA0001791), including but not limited to notices of noncompliance, notices of equipment malfunction, notices of daily or monthly maximum exceedances, and any permittee record or report requested by the Environmental Protection Agency, from May 7, 2015 to the date this request is filed;

- Monitoring reports mandated by the monitoring requirements described in the facility's NPDES permit, including but not limited to all Discharge Monitoring Reports (DMRs) for outfalls 002A, 002B, 004, and 007, and all annual and semiannual certifications, from May 7, 2015 to the date this request is filed;

- Enforcement documents associated with the facility, including but not limited to letters of warning, notices of violation, and administrative orders, from May 7, 2015 to the date this request is filed; and

- Consent agreements, court orders, administrative orders, or other orders governing the terms or status of the facility's compliance with its NPDES Permit, from May 7, 2015 to the date this request is filed.



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Please provide the requested records in electronic format if possible. To the extent you believe any requested record is exempt from disclosure, please provide a log identifying which documents you claim are exempt, specify the exemption or privilege that you assert is applicable, and explain why you believe such exemption or privilege is applicable.

CLF requests that any fees incurred in conjunction with this request be waived, as disclosure of the requested records is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in the commercial interest of the requester. 5 U.S.C. § 552(a)(4)(A)(iii); 40 C.F.R. § 2.107(l). CLF is a 501(c)(3) organization and is seeking this information to inform CLF members and the public, including nearby residents, about the current state of environmental permitting and compliance at the facility listed as Texas Instruments, Inc., 34 Forest, Attleboro, MA 02703.

In the event that our request for a fee waiver is denied, we request that the total cost be minimized by providing the information in electronic format. Also, if fees are assessed, please provide in advance a written, itemized, good faith estimate of such fees. *Id.* at 32.07(2)(b).

We look forward to your written response within twenty business days from this request. Please do not hesitate to contact me at (617) 850-1782 or jgibson@clf.org if you have any questions. Thank you in advance for your time and attention to this matter.

Sincerely,

Juanita Gibson
Legal Fellow
Conservation Law Foundation